

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>GINGER RAE RAMSEY</b>	:	
	:	<b>CASE NO. 1:16-bk-00001</b>
	:	
<b>Debtor</b>	:	
	:	

**MOTION FOR AMENDED ORDER TO PAY TRUSTEE**

Comes now Ginger Rae Ramsey by and through Kara K. Gendron, Esquire of Mott & Gendron Law, and requests an Order to pay Trustee, respectfully representing in support thereof:

1. The Debtor filed a Chapter 13 petition on January 1, 2016 at the above-captioned docket number.
2. The Debtor receives regular income from employment which may be attached under 11 U.S.C. Section 1326 to fund the Chapter 13 Plan.
3. The likelihood of success in this case will be much greater if the income is attached to fund the Plan.
4. The Debtor consents to the wage attachment.

Wherefore, the Debtor respectfully requests that this Court enter an Order to pay Trustee in the form attached.

Respectfully submitted,

/s/ Kara K. Gendron  
Kara K. Gendron, Esquire  
Attorney ID # 87577  
Mott and Gendron Law  
125 State Street  
Harrisburg PA 17101  
(717) 232-6650 Tel  
(717) 232-0477 Fax  
karagendron@gmail.com

/s/ Ginger Rae Ramsey

**UNITED STATES BANKRUPTCY COURT  
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<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>GINGER RAE RAMSEY</b>	:	
	:	<b>CASE NO. 1:16-bk-00001</b>
<b>Debtor</b>	:	
	:	
	:	
	:	

**AMENDED ORDER TO PAY TRUSTEE**

Upon consideration of the Motion for Wage attachment, it is hereby ordered that until further Order of this Court the entity from whom the Debtor, Ginger Rae Ramsey receives income:

HIGHMARK PAYROLL DEPARTMENT  
ATTN: PAYROLL DEPARTMENT  
ATTN: ELIZABETH COLE  
1800 CENTER STREET 2A L3  
CAMP HILL, PA 17011

deduct from said income the sum of \$575.00 from each two-week pay check, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination or other benefits arising out of present or past employment, or from any other benefits payable to the Debtor and to remit the deductible sums to:

CHARLES J DEHART III ESQUIRE  
PO BOX 7005  
LANCASTER, PA 17604

It is further ordered that the employer shall change the amount of the monthly remittance to the Trustee in the future, if the Employer is directed to do so in writing, either by the Trustee or by the Debtor's counsel and to continue the wage attachment until the Employer is directed in writing to discontinue the attachment, either by the Trustee or Debtor's counsel. It is further ordered that the entity from whom the Debtor receives income shall notify the Trustee if the Debtor's income is terminated and the reason therefore. It is further ordered that all remaining income of the Debtor, except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to the Debtor in accordance with usual payment procedure. It is further ordered that this Order shall terminate without further order upon certification that the obligation of the Debtor has been fulfilled, if it is not terminated by earlier order of this Court.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
**GINGER RAE RAMSEY** :  
: **CASE NO. 1:16-bk-00001**  
:  
:  
**Debtor(s)** :

**CERTIFICATE OF SERVICE**

I certify that on 12/29/17 I served a copy of the foregoing document(s) on the following parties:

<b>Name and Address</b>	<b>Mode of Service</b>
CHARLES J DEHART, III, TRUSTEE	Electronically
HIGHMARK PAYROLL DEPARTMENT ATTN: PAYROLL DEPARTMENT ATTN: ELIZABETH COLE 1800 CENTER STREET 2A L3 CAMP HILL, PA 17011	First Class Mail, Postage Prepaid

I certify under penalty of perjury that the foregoing is true and correct.

Date: 12/29/17

/s/ Kara K. Gendron,  
Kara K Gendron, Esq.  
Attorney ID #:87577  
Mott and Gendron Law  
125 State Street  
Harrisburg, PA 17101  
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karagendron@gmail.com